

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARY ESPOSITO, Individually and on Behalf
of All Other Persons Similarly Situated,

Plaintiff,

v.

AMERICAN RENAL ASSOCIATES
HOLDINGS, INC., JOSEPH A. CARLUCCI,
JONATHAN L. WILCOX, SYED T. KAMAL,
JONATHAN J. McDONOUGH,
CENTERBRIDGE CAPITAL PARTNERS L.P.,
MERRILL LYNCH, PIERCE, FENNER, &
SMITH, INC., BARCLAYS CAPITAL INC.,
GOLDMAN, SACHS & CO., WELLS FARGO
SECURITIES, LLC, SUNTRUST ROBINSON
HUMPHREY, and LEERINK PARTNERS LLC,

Defendants.

Civil Action No.: 16 Civ. 11797 (ADB)

CLASS ACTION

ECF Case

**DECLARATION OF IRA M. PRESS IN SUPPORT OF
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, Ira M. Press, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the law firm of Kirby McInerney LLP (“Kirby McInerney”), Lead Counsel for Lead Plaintiffs in the above-captioned action (the “Action”). As such, I have knowledge of the matters set forth herein. I make this declaration in support of Lead Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement, Certification of a Settlement Class, and Approval of Notice to the Settlement Class, filed concurrently herewith.

2. True and correct copies of the following documents are reproduced and annexed hereto:

Exhibit 1: Stipulation of Settlement (“Stipulation”) executed on January 30,

2018 and Exhibits A ([Proposed] Order Preliminarily Approving Class Action Settlement and Providing for Notice and Settlement Hearing), A-1 (Postcard Notice of Proposed Settlement), A-2 (Full Notice of Settlement of Class Action and Settlement Fairness Hearing, and Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses), A-3 (Summary Notice of Pendency and Settlement of Class Action), A-4 (Proof of Claim and Release), and B ([Proposed] Order and Final Judgment) attached thereto.

Exhibit 2: Firm Resume of Kirby McInerney LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed on January 31, 2018 in New York, New York.

/s/ Ira M. Press

Ira M. Press (admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically on this 31st day of January, 2018, to the registered participants as on the Notice of Electronic Filing (NEF). At this time, I am not aware of any non-registered participants to whom paper copies must be sent.

/s/ Ira M. Press

Ira M. Press